

MONTANA FISH, WILDLIFE & PARKS

PUBLIC COMMENTS FROM MONTANA BOVINE TUBERCULOSIS SURVEILLANCE PLAN

1. Montana's Department of Fish Wildlife & Parks has produced a commendable Bovine Tuberculosis Surveillance Plan in advance of a bTB crisis in the state. As a former contributor to the Michigan Department of Agriculture and Rural Development's Bovine Tuberculosis Program, I am intensely familiar with how economically devastating bTB can be. The three goals of the proposed Plan, early detection of the diseases in wildlife, preventing spillover of the disease from wildlife to livestock, and preparing a response are appropriate actions for the Department to undertake. As noted in the Plan, the economic implications of bTB spilling over from wildlife into livestock are astronomical – estimated at \$45 million dollars to control in Michigan, which has less than half the cattle population of Montana (MI: 1,150,000 [1] MT: 2,500,000 [2]). The Plan's authors are right in highlighting that a rapid response is critical to controlling an outbreak. Montana is already one step ahead of limiting the potential for this disease to spread by enforcing a ban on feeding of livestock, something that Midwestern states who have struggled with bTB outbreaks could learn from. One question to consider is: Is the Department prepared to deal with public outcry that will undoubtedly accompany wildlife removals? The acknowledgement that lethal removal of wildlife around infected hot spots may require 2-3 years of culling is wise and should also be incorporated into public messaging up front. The suggestion that a final wildlife surveillance plan will be developed in collaboration with a variety of relevant agencies is commendable. If there is not already funding secured for this work, and a timeline developed for its production should be established. Rapid response following detection of infected wildlife is the only way to prevent an economically devastating spillover, and this will only be effectively accomplished if a final plan of response is in place before detection occurs.
[1] https://www.nass.usda.gov/Quick_Stats/Ag_Overview/stateOverview.php?state=MICHIGAN
[2] https://www.nass.usda.gov/Statistics_by_State/Montana/Publications/Special_Interest_Reports/agfacts.pdf

Colleen Crill Matzke, Bozeman MT

Chairman Colton & Commissioners:

Laurel Rod & Gun Club wishes to have our comment regarding the Bovine Tuberculosis Surveillance Program added to the official record. We greatly appreciate being able to add our voice to this discussion.

LRGC says thank you to FWP for introducing the bBT surveillance, we are blessed with many good folks at FWP that truly care about our Montana outdoor traditions and our public trust wildlife.

The agenda item cover sheet states; the primary motive for surveillance and early detection of bTB in wildlife includes the potential for wildlife species to serve as a reservoir for transmission to cattle, Instead, we believe that wording needs to be corrected to read; **The primary motives for surveillance and early detection of bTB in both domestic livestock and wildlife would serve both on an equal basis, not a livestock bias, the different wording shows a more equal value to both our public trust wildlife and the cattle industry. .**

The recent strain detections in South Dakota appear similar to Central Mexico strains. LRGc is curious if this could have moved North with the popular corriente and longhorn cattle? Are regulations and monitoring movements of cattle from area to area, domestic and/or foreign effective and transparent?

As we have with both brucellosis and possibly connections with CWD, LRGc strongly believes this another disease area that may strongly correlate with un-natural (Harboring) concentrations of ungulates.

We see a horizon with another disease spreading to our wildlife and therefore, our wildlife becoming both a real and anecdotal scapegoat for spreading the disease to cattle. We've seen this manifestation with our public elk and brucellosis. The common theme here is neither brucellosis nor bBT was originally introduced into Montana's landscape by our wildlife.

In essence, all parties need to have meaningful discussions and subsequent action(s) around harboring. LRGc believes as more diseases come into being, harboring discussions/actions can't be avoided Are we willing to allow known and future diseases to blight our Montana landscape? In closing, LRGc says thanks a bunch for accepting our comment.

Respectfully submitted, LRGc Conservation Committee,

Irv Wilke, Herb Stoic, Sharla Thompson, Curt Lord, Jim Simons, Jason O'Rear, Ben Lewis & JW Westman

Dear Chairman Colton and Commissioners:

The Montana Sportsmen Alliance, a voice of reason for Montana hunters, anglers and conservationists, wishes to have our comments regarding the Bovine Tuberculosis Surveillance Program added to the official record. We greatly appreciate being able to add our perspective to this discussion.

MSA would like to thank FWP staff that had the foresight to initiate the proposed BTS Program. It reflects well on the commitment of staff to their role in maintaining public trust resources and important Montana outdoor traditions.

We offer a recommended change to the rationale for the surveillance program as outlined in the Agenda Item Cover Sheet. We understand and support the concern of the livestock industry as it relates to the major economic consequence in the loss of bTB-free status to cattle producers. However, we likewise believe that Public Trust resources with a bTB-free designation are just as critical in the long-term, especially as free-ranging wildlife on the Montana landscape and all that this implies. We urge you to consider language that speaks in support of those joint priorities.

Background information in the proposal indicates that bTB is endemic in Alberta and sporadically occurs in Montana. Furthermore, it has been detected in Harding County, South Dakota that abuts southeastern Montana. Given the similarity of the strain identified in South Dakota to that found in central Mexico, we question if the northward vector of the disease is in any way linked to Corriente or longhorn cattle? It also raises the question of how stringent are the regulations and monitoring of cattle shipping from area to area whether of domestic or foreign origin?

From a management standpoint, the ever-expanding disease issue, whether it's Brucellosis, CWD or bTB, consistently speaks to the enhanced risk of transmission resulting from un-natural concentrations of wildlife. Harboring continues to represent a significant threat to our public trust resources. A common theme to both Brucellosis and bTB discussions is that cattle borne diseases can be transmitted to wildlife that then becomes potential reservoirs of the disease. Wildlife populations are then targeted with management actions designed to restrict their abundance and or distribution. The irony of this sequence should not be lost on decision-makers.

Sincerely,

MSA Leadership Group

STATE OF MONTANA

STEVE BULLOCK, GOVERNOR

DEPARTMENT OF LIVESTOCK
PO BOX 202001
HELENA, MONTANA 59620-2001



DEPARTMENT OF LIVESTOCK (406) 444-7323
ANIMAL HEALTH & FOOD SAFETY DIVISION (406) 444-2043
BRANDS ENFORCEMENT DIVISION (406) 444-2045
CENTRALIZED SERVICES DIVISION (406) 444-4993
FAX (406) 444-1929

November 18, 2019

Comments from the Montana Department of Livestock on the Proposed Montana Bovine Tuberculosis Surveillance Plan

The Montana Department of Livestock (MDOL) appreciates the opportunity to provide comment on Fish, Wildlife and Parks' proposed Montana Bovine Tuberculosis Surveillance Plan.

Bovine tuberculosis is a financially devastating disease when diagnosed in domestic cattle herds. MDOL sets requirements for animals entering Montana to reduce the risk of introduction of the disease. Recent detections of bovine tuberculosis in beef cattle at slaughter is an importation reminder of the need for biosecurity and disease surveillance.

Additionally, the presence of bovine tuberculosis in white-tailed deer in areas of Michigan has resulted in a labor intensive and costly management program for livestock producers in impacted areas. Early detection and management of bovine tuberculosis cases that may be found in Montana, whether domestic livestock or wildlife, will be critical to preventing a similar outcome here in Montana.

MDOL appreciates and supports the draft plan's emphasis on rapid detection, strong communication, and risk-based surveillance. All are important to the maintenance of Montana's tuberculosis class free status.

MDOL supports the plan as proposed.